

THE HONORABLE JOHN H. CHUN

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

CASE NO. 2:23-cv-01495-JHC

**STIPULATED MOTION AND  
[PROPOSED] ORDER TO  
EXTEND THE DEADLINE FOR  
COURT-ORDERED RULE  
30(b)(6) DEPOSITION**

NOTE ON MOTION CALENDAR:  
July 22, 2024

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below regarding a Fed. R. Civ. P. 30(b)(6) deposition ordered by the Court (Dkt. #238).

In support of this request, the parties represent the following to the Court:

1. On July 9, 2024, the Court ordered a Rule 30(b)(6) deposition of Defendant's representative on document retention "to take place within 30 days of this order." (Dkt. #238). At the deposition, "Plaintiffs may inquire into (1) when and to whom the litigation hold notices were given, (2) what kinds and categories of

information and data Defendant's employees were instructed to preserve and collect, and (3) what specific actions they were instructed to take to that end." *Id*

2. The parties met and conferred about the Court's order. Amazon confirmed that it is preparing a representative to testify to the topics identified in the Court's order. Amazon also indicated that, due to previously scheduled travel, it would require a modest extension of the 30-day period contemplated by the Court's order.

3. Plaintiffs are amenable to the modest extension proposed by Amazon.

4. If acceptable to the Court, the parties have reached agreement to hold the deposition on August 21, 2024, in Washington, DC. This would result in the deposition taking place within 45 days of the Court's order.

5. The parties thus stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this Stipulation:

a. The Rule 30(b)(6) deposition called for by the Court's July 9, 2024 Order shall take place on August 21, 2024 in Washington, DC.

Stipulated to and respectfully submitted this 22nd day of July, 2024, by:

**MORGAN, LEWIS & BOCKIUS LLP**

By: s/ Patty A. Eakes  
Patty A. Eakes, WSBA #18888  
Molly A. Terwilliger, WSBA #28449  
1301 Second Avenue, Suite 3000  
Seattle, WA 98101  
Phone: (206) 274-6400  
Email: patty.eakes@morganlewis.com  
molly.terwilliger@morganlewis.com

*Attorneys for Defendant Amazon.com, Inc.*

**WILLIAMS & CONNOLLY LLP**

Heidi K. Hubbard (*pro hac vice*)  
John E. Schmittlein (*pro hac vice*)  
Kevin M. Hodges (*pro hac vice*)  
Jonathan B. Pitt (*pro hac vice*)  
Carl R. Metz (*pro hac vice*)  
Carol J. Pruski (*pro hac vice*)  
Katherine Trefz (*pro hac vice*)  
680 Maine Avenue SW  
Washington, DC 20024  
Phone: (202) 434-5000  
Email: hhubbard@wc.com  
khodges@wc.com  
jpitt@wc.com  
cmetz@wc.com  
cpruski@wc.com  
ktrefz@wc.com

**COVINGTON & BURLING LLP**

Thomas O. Barnett (*pro hac vice*)  
Derek Ludwin (*pro hac vice*)  
Kate Mitchell-Tombras (*pro hac vice*)  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Phone: (202) 662-5407  
Email: tbarnett@cov.com  
dludwin@cov.com  
kmitchelltombras@cov.com

**WILKINSON STEKLOFF LLP**

Kosta S. Stojilkovic (*pro hac vice*)  
2001 M Street NW, 10th Floor  
Washington, DC 20036  
Phone: (202) 847-4045  
Email: kstojilkovic@wilkinsonstekloff.com

*Attorneys for Defendant Amazon.com, Inc.*

s/ Edward H. Takashima

SUSAN A. MUSSER (DC Bar # 1531486)

EDWARD H. TAKASHIMA (DC Bar #

1001641)

EMILY K. BOLLES (NY Reg. # 5408703)

KARA KING (DC Bar # 90004509)

ERIC ZEPP (NY Reg. #5538491)

Federal Trade Commission

600 Pennsylvania Avenue, NW

Washington, DC 20580

Tel.: (202) 326-2122 (Musser)

(202) 326-2464 (Takashima)

Email: smusser@ftc.gov

etakashima@ftc.gov

ebolles@ftc.gov

kking@ftc.gov

ezepp@ftc.gov

*Attorneys for Plaintiff Federal Trade  
Commission*

s/ Michael Jo

Michael Jo (admitted *pro hac vice*)  
Assistant Attorney General, Antitrust Bureau  
New York State Office of the Attorney  
General  
28 Liberty Street  
New York, NY 10005  
Telephone: (212) 416-6537  
Email: Michael.Jo@ag.ny.gov  
*Counsel for Plaintiff State of New York*

s/ Rahul A. Darwar

Rahul A. Darwar (admitted *pro hac vice*)  
Assistant Attorney General  
Office of the Attorney General of Connecticut  
165 Capitol Avenue  
Hartford, CT 06016  
Telephone: (860) 808-5030  
Email: Rahul.Darwar@ct.gov  
*Counsel for Plaintiff State of Connecticut*

s/ Alexandra C. Sosnowski

Alexandra C. Sosnowski (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection and Antitrust Bureau  
New Hampshire Department of Justice  
Office of the Attorney General  
One Granite Place South  
Concord, NH 03301  
Telephone: (603) 271-2678  
Email: Alexandra.c.sosnowski@doj.nh.gov  
*Counsel for Plaintiff State of New Hampshire*

s/ Caleb J. Smith

Caleb J. Smith (admitted *pro hac vice*)  
Assistant Attorney General  
Consumer Protection Unit  
Office of the Oklahoma Attorney General  
15 West 6th Street, Suite 1000  
Tulsa, OK 74119  
Telephone: (918) 581-2230  
Email: caleb.smith@oag.ok.gov  
*Counsel for Plaintiff State of Oklahoma*

s/ Timothy D. Smith

Timothy D. Smith, WSBA No. 44583  
Senior Assistant Attorney General  
Antitrust and False Claims Unit  
Oregon Department of Justice  
100 SW Market St  
Portland, OR 97201  
Telephone: (503) 934-4400  
Email: tim.smith@doj.state.or.us  
*Counsel for Plaintiff State of Oregon*

s/ Jennifer A. Thomson

Jennifer A. Thomson (admitted *pro hac vice*)  
Senior Deputy Attorney General  
Pennsylvania Office of Attorney General  
Strawberry Square, 14th Floor  
Harrisburg, PA 17120  
Telephone: (717) 787-4530  
Email: jthomson@attorneygeneral.gov  
*Counsel for Plaintiff Commonwealth of Pennsylvania*

s/ Michael A. Undorf

Michael A. Undorf (admitted *pro hac vice*)  
Deputy Attorney General  
Delaware Department of Justice  
820 N. French St., 5th Floor  
Wilmington, DE 19801  
Telephone: (302) 683-8816  
Email: michael.undorf@delaware.gov  
*Counsel for Plaintiff State of Delaware*

s/ Christina M. Moylan

Christina M. Moylan (admitted *pro hac vice*)  
Assistant Attorney General  
Chief, Consumer Protection Division  
Office of the Maine Attorney General  
6 State House Station  
Augusta, ME 04333-0006  
Telephone: (207) 626-8800  
Email: christina.moylan@maine.gov  
*Counsel for Plaintiff State of Maine*

s/ Gary Honick

Gary Honick (admitted *pro hac vice*)  
 Assistant Attorney General  
 Deputy Chief, Antitrust Division  
 Office of the Maryland Attorney General  
 200 St. Paul Place  
 Baltimore, MD 21202  
 Telephone: (410) 576-6474  
 Email: Ghonick@oag.state.md.us  
*Counsel for Plaintiff State of Maryland*

s/ Michael Mackenzie

Michael Mackenzie (admitted *pro hac vice*)  
 Deputy Chief, Antitrust Division  
 Office of the Massachusetts Attorney General  
 One Ashburton Place, 18th Floor  
 Boston, MA 02108  
 Telephone: (617) 963-2369  
 Email: michael.mackenzie@mass.gov  
*Counsel for Plaintiff Commonwealth of Massachusetts*

s/ Scott A. Mertens

Scott A. Mertens (admitted *pro hac vice*)  
 Assistant Attorney General  
 Michigan Department of Attorney General  
 525 West Ottawa Street  
 Lansing, MI 48933  
 Telephone: (517) 335-7622  
 Email: MertensS@michigan.gov  
*Counsel for Plaintiff State of Michigan*

s/ Zach Biesanz

Zach Biesanz (admitted *pro hac vice*)  
 Senior Enforcement Counsel  
 Office of the Minnesota Attorney General  
 445 Minnesota Street, Suite 1400  
 Saint Paul, MN 55101  
 Telephone: (651) 757-1257  
 Email: zach.biesanz@ag.state.mn.us  
*Counsel for Plaintiff State of Minnesota*

s/ Lucas J. Tucker

Lucas J. Tucker (admitted *pro hac vice*)  
 Senior Deputy Attorney General  
 Office of the Nevada Attorney General  
 100 N. Carson St.  
 Carson City, NV 89701  
 Telephone: (775) 684-1100  
 Email: LTucker@ag.nv.gov  
*Counsel for Plaintiff State of Nevada*

s/ Ana Atta-Alla

Ana Atta-Alla (admitted *pro hac vice*)  
 Deputy Attorney General  
 New Jersey Office of the Attorney General  
 124 Halsey Street, 5th Floor  
 Newark, NJ 07101  
 Telephone: (973) 648-3070  
 Email: Ana.Atta-Alla@law.njoag.gov  
*Counsel for Plaintiff State of New Jersey*

s/ Jeffrey Herrera

Jeffrey Herrera (admitted *pro hac vice*)  
 Assistant Attorney General  
 New Mexico Office of the Attorney General  
 408 Galisteo St.  
 Santa Fe, NM 87501  
 Telephone: (505) 490-4878  
 Email: jherrera@nmag.gov  
*Counsel for Plaintiff State of New Mexico*

s/ Zulma Carrasquillo-Almena

Zulma Carrasquillo (admitted *pro hac vice*)  
 Assistant Attorney General  
 Antitrust Division  
 Puerto Rico Department of Justice  
 P.O. Box 9020192  
 San Juan, Puerto Rico 00901-0192  
 Telephone: (787) 721-2900  
 Email: zcarrasquillo@justicia.pr.gov  
*Counsel for Plaintiff Commonwealth of Puerto Rico*

s/ Stephen N. Provazza

Stephen N. Provazza (admitted *pro hac vice*)  
Special Assistant Attorney General  
Chief, Consumer and Economic Justice Unit  
Department of the Attorney General  
150 South Main Street  
Providence, RI 02903  
Telephone: (401) 274-4400  
Email: sprovazza@riag.ri.gov  
*Counsel for Plaintiff State of Rhode Island*

s/ Sarah L.J. Aceves

Sara L. J. Aceves (admitted *pro hac vice*)  
Assistant Attorney General  
Vermont Attorney General's Office  
109 State Street  
Montpelier, VT 05609  
Telephone: (802) 828-3170  
Email: sarah.aceves@vermont.gov  
*Counsel for Plaintiff State of Vermont*

s/ Laura E. McFarlane

Laura E. McFarlane (admitted *pro hac vice*)  
Assistant Attorney General  
Wisconsin Department of Justice  
Post Office Box 7857  
Madison, WI 53707-7857  
Telephone: (608) 266-8911  
Email: mcfarlanele@doj.state.wi.us  
*Counsel for Plaintiff State of Wisconsin*

**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
THE HONORABLE JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

*Presented By:*

**MORGAN, LEWIS & BOCKIUS LLP**

By: s/ Patty A. Eakes  
Patty A. Eakes, WSBA #18888  
Molly A. Terwilliger, WSBA #28449  
1301 Second Avenue, Suite 3000  
Seattle, WA 98101  
Phone: (206) 274-6400  
Email: patty.eakes@morganlewis.com  
molly.terwilliger@morganlewis.com

*Attorneys for Defendant Amazon.com, Inc.*